

**REMARKS**

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

**Status of Claims:**

No claims are currently added or cancelled.

Claim 24 is currently being amended to correct an obvious grammatical error in that claim, without affecting the scope of that claim.

This amendment and reply amends a claim in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claims remain under examination in the application, is presented, with an appropriate defined status identifier.

Claims 1-25 remain pending in this application.

**Request for Entry of After-final Amendment and Reply:**

It is respectfully requested that this after-final amendment and reply be considered and entered, since: a) it is believed to place this application in condition for allowance without affecting the scope of the claims, and b) it resolves a grammatical issue with one claim (claim 24).

**Claim Rejections – 35 U.S.C. § 112, 1<sup>st</sup> Paragraph:**

In the Office Action, claims 1-25 were rejected under 35 U.S.C. § 112, 1<sup>st</sup> Paragraph, as failing to comply with the written description requirement. In particular, the Office Action asserts that the “Although page 9 of the Specification discusses allowing the user to select whether to automatically create or allow the user to create business rules, there is no indication of multiple commands.” Applicant respectfully disagrees with the Office Action’s interpretation of the specification. In particular, page 8, line 25 to page 9, line 3 of the specification describes user controls as shown in Figure 5 of the drawings, whereby the user can turn on or turn off various features, such as: a) whether sample data is to be generated, b) whereby a source or target model is to be generated as the XML data type model, c) whether a source or target model is to be generated as the XML flat file or database model, and d) whether the user wants business rules to be generated automatically or not. Clearly, from this description and from the user interface as shown in Figure 5 of the drawings, the user can

select some or all of the features mentioned above, thereby requiring one or more user commands (e.g., mouse clicks made on the GUI display of Figure 5) to effect such selections.

Accordingly, the presently pending claims are fully compliant with 35 U.S.C. § 112, 1<sup>st</sup> Paragraph.

**Claim Rejections – Prior Art:**

In the Office Action, claims 1, 4-5, 10-11, 13-15, 24 and 25 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent 6,678,867 to Fong et al. (hereafter “Fong”). Claim 6 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Fong et al. Claim 12 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Fong et al. in view of U.S. Patent Publication No. 2002/0143521 to Call (hereafter “Call”). Claims 2, 3, 7-9, and 16-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fong in view of U.S. patent application 2002/0026461 to Kutay et al. (hereafter “Kutay”). Applicant respectfully traverses these rejections for at least the following reasons.

Presently pending independent claims 1, 24 and 25 recite:

selecting, by a user by way of a first user command, whether or not to automatically create or to allow the user to create business rules for moving data from a source file to a target file for a plurality of defining items in the source model, and wherein the target model and the source model are created based in part on a second user command to initiate creation of such models automatically.

Fong does not teach or suggest the capability of inputting a first user command to allow a user to decide whether or not to automatically create business rules or to have the user himself/herself create the business rules for moving data from a source file to a target file for a plurality of defining items in a source model. Furthermore, Fong does not teach or suggest that the target model and the source model are created based in part on a second user command to initiate creation of such models automatically.

Column 3, lines 20-31 of Fong describes that a user is provided a tool to define the transformation of an SGML document into an HTML document, whereby no description is made as to creation of a target model or a source model automatically based on a user command.

Column 3, lines 54-67 of Fong describes a user interface to provide a user with selectable options for assigning attribute values for target components, whereby no

description is made as to creation of a target model or a source model automatically based on a user command.

Column 4, lines 1-10 of Fong describes transformation rules that are processed by a map create to create a transformation map, whereby no description is made as to creation of a target model or a source model automatically based on a user command.

In the Response to Arguments section on page 14 of the Office Action, it argues that “Although the user is creating a **transformation map**; the user is not necessarily ‘**creating a target model or source model**’ because all the user does is initiate the transformation by selecting an input source file for transformation to a target output file which meets the limitation **selecting, by a user by way of a first user command, whether or not to automatically create or allow the user to create business rules.**”

In response, with all due respect, the selecting of an input source file for transformation to a target output file does not correspond in any way, shape or form to a user selection of whether or not to automatically create business rules. Reading the above passage from page 14 of the Office Action clearly shows the faulty logic, since the Office Action jumps to a conclusion with no basis for doing so. In other words, the creation of a transformation map by a user in no way is related to a user selecting whether or not to automatically create business rules.

Since Kutay and Call do not rectify the above-mentioned shortcomings of Fong, each of the presently pending claims is patentable over the cited art of record.

With respect to the rejection of dependent claim 12 based on the combination of Fong and Call, the Office Action asserts that pages 2 and 3 of Call teach the “wherein the flat file or database model is a fixed length representation of a variable-length XML file” features recited in that claim. Applicant respectfully disagrees. In particular, while paragraph 0020 of Call describes that “integers have a fixed length”, this does not mean that two different variable-length XML files are stored with the same number of integers. Rather, as gleaned from paragraph 0017 of Call, variable-length XML files are stored with different number of integers in the system of Call, which is totally different from the features recited in claim 12.

Thus, claim 12 is patentable for these additional reasons, beyond the reasons given above for its base claim 1.

With respect to the rejection of dependent claim 6, that claim recites providing a plurality of rule builder icons on the single display respectively adjacent to a plurality of data

model items, wherein selection of one of the rule builder icons provides for a window to open up on the single display to allow the user to create a rule for the adjacent data model item. In its rejection of claim 6, the Office Action asserts that Figures 12B and 12C of Fong teach displaying the source and target model conversions, and that “Fong discloses the user of icons within a GUI wherein an icon is displayed on a screen and can be manipulated by the user. The icon generates a user-friendly interface upon selection of the icon. See column 2, lines 1-18.” As is clear from Fong and as implicitly acknowledged in the Office Action, Fong does not teach or suggest the user of icons for generating business rules, but rather only for source and target model conversions. It would not have been obvious for one of ordinary skill in the art to utilize icons with separate windows opening up, as recited in claim 6, based on the teachings of Fong, since Fong’s use of icons is only concerned with source and target model conversions, and not business rule generation. The provision of an adjacent data model item provided on a window opened up on a single display, as recited in claim 6, is not taught or suggested by the simple GUI features of Map Editing as shown in Figures 12A and 12B of Fong, for use in editing or creating a map. The fact that column 2, lines 1-18 of Fong describes standard features of a GUI does not come close to meeting the specific features of claim 6, even with the disclosure of Figures 12A and 12B of Fong.

Accordingly, claim 6 is patentable for these additional reasons, beyond the reasons given above for its base claim 1.

**Conclusion:**

Since all of the issues raised in the Office Action have been addressed in this response, Applicant believes that the present application is now in condition for allowance, and an early indication of allowance is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for

such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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